SOUTH FLORIDA WATER MANAGEMENT DISTRICT

March 26, 2018

Honorable R. D. James
Assistant Secretary of the Army for Civil Works
Room 6S91, GAO Building
441 G. Street, N.W.
Washington DC 20314

Subject: Submission of Integrated Feasibility Study and Draft Environmental Impact Statement (FS/DEIS) for a Proposed Post-Authorization Change to the Central Everglades Planning Project

Dear Secretary James:

The South Florida Water Management District (SFWMD) is pleased to submit an Integrated Feasibility Study and Draft Environmental Impact Statement (FS/DEIS) for your review, approval and subsequent transmittal to the Committee on Environment and Public Works of the U.S. Senate and Committee on Transportation and Infrastructure of the U.S. House of Representatives for Congressional authorization, in accordance with the provisions of Section 203 of Water Resources Development Act (WRDA) 1986, as amended.

With limited technical assistance provided by the U.S. Army Corps of Engineers staff under a Section 203 Memorandum of Agreement and DD Form 1144 Support Agreement, SFWMD developed this FS/DEIS to recommend a post-authorization change to the federally authorized Central Everglades Planning Project (CEPP). The post-authorization change will significantly increase the project's ecosystem restoration benefits to the Caloosahatchee and St. Lucie Estuaries and the central portion of the Everglades, including Water Conservation Area 3 and Everglades National Park. Based on feedback SFWMD has received to date, the Tentatively Selected Plan (TSP) recommended in the FS/DEIS has broad support from federal, state and local agencies, stakeholders interest groups and the public.

The CEPP, as authorized by Congress in WRDA-2016, provided the first increment of environmental restoration described in the 1999 Comprehensive Everglades Restoration Plan (CERP) by reducing the harmful freshwater discharges from Lake Okeechobee to the Caloosahatchee and St. Lucie estuaries and by providing additional freshwater flows to the central Everglades. As envisioned in CERP and the CEPP, the FS/DEIS recommends a post-authorization change to modify the "New Water" component of the CEPP to provide additional water storage, treatment and conveyance in the Everglades Agricultural Area.

The TSP provided in the FS/DEIS is consistent with the goals, objectives and project assurances of the Comprehensive Everglades Restoration Plan and substantially decreases the frequency and intensity of damaging regulatory discharges from Lake Okeechobee to the St. Lucie and Caloosahatchee estuaries, thereby improving salinity and ecological conditions in the estuaries. The CEPP, as modified by this TSP, will provide a 63% reduction in the number of discharge

events and an overall 55% reduction in discharge volumes from Lake Okeechobee to these northern estuaries. The TSP modifications will also substantially increase the amount of treated water delivered to the central Everglades. On an average annual basis, flows to the Central Everglades will be approximately 370,000 acre-feet, compared with the approximately 210,000 acre-feet provided by the authorized CEPP. The additional storage and treatment capacity of the TSP will deliver the remaining increment of freshwater flow to the central Everglades envisioned in CERP and significantly reduce impacts to Florida's Northern estuaries from USACE flood control releases.

SFWMD conducted the study and prepared the FS/DEIS in accordance with pertinent USACE engineering regulations (ERs) and planning and policy guidance. Draft versions of the FS/DEIS were subjected to various levels of review, including: 1) an independent external peer review (IEPR); 2) an independent cost and risk analysis; and 3) an agency technical review with government agencies, all of which were conducted following objectives and procedures consistent with USACE review guidance to the extent possible given that USACE did not directly participate in any of the reviews. The IEPR panel found that the document was well written, technically sound and built on a strong foundation of science and engineering. A summary of the reviews performed for the study is included in Annex E of the FS/DEIS.

During the study, SFWMD staff made a determined effort to engage and seek input from federal, state, local and tribal government agencies, a wide variety of business and special interest parties and the public. To support the engagement of these agencies, stakeholders and the public in the study, SFWMD developed and maintained an interactive website located at https://www.sfwmd.gov/our-work/cerp-project-planning/eaa-reservoir that contains a project tracker and routinely updated information on public meetings, modeling results and other study related materials. This website also allowed an opportunity for agencies, stakeholders and the public to provide input and comments on the draft study results posted.

SFWMD coordinated with agencies and tribes for which government-to-government coordination or consultation will be required during the U.S. Army Corps of Engineers review of the FS/DEIS. SFWMD has maintained close communication with the USACE Jacksonville District staff throughout our study process. The public and agency involvement efforts completed to date are summarized in the FS/DEIS.

The total estimated first cost for the currently authorized CEPP (FY2018 price level) is $2,031,000,000. The total estimated first cost of CEPP, as modified by the TSP identified in the FS/DEIS, is $3,174,000,000 (FY2018 price level), with an estimated Federal cost of $1,587,915,000 and an estimated non-Federal cost of $1,586,085,000. The project first cost includes recreation features totaling $10,000,000. The average annual cost of the recreation features is $437,800 and the average annual benefits are $1,214,400, resulting in net benefits of $776,700 and a 2.77 to 1 benefit to cost ratio.

The estimated total annual cost of Operations, Maintenance, Repair, Replacement and Rehabilitation (OMRR&R) for the currently authorized CEPP (FY2018 price level) is $11,920,000. The estimated total annual cost of OMRR&R for CEPP (FY2018 price level), as modified by the TSP identified in the FS/DEIS, is $13,743,000, with an estimated annual Federal OMRR&R cost of $6,871,500 and an estimated annual non-Federal OMRR&R cost of $6,871,500. Average annual monitoring costs, which include both 10-year cycle costs amortized over the period of

analysis and the annual cost of longer-term monitoring requirements, totals $6,236,000. The estimated Federal cost is $3,118,000 and the non-Federal cost is $3,118,000. The estimated cost for OMRR&R of the recreation elements is $68,000, which is 100% non-Federal responsibility.

As required by USACE Engineering Regulation ER 1165-2-209, we have enclosed 15 printed copies and 15 CDs of the FS/DEIS, including all appendices and annexes. We have also enclosed a proposed mailing list of interested parties for use by your office in coordinating public review.

Because of the critical importance of this project modification to reducing the negative environmental impacts of Lake Okeechobee discharges on the Caloosahatchee and St. Lucie Estuaries, SFWMD is targeting WRDA-2018 for authorization of the modifications recommended in this FS/DEIS. I understand that according to Section 203 of WRDA-1986, as amended, your office has 180 days to review the FS/DEIS to determine if the recommended project modification is feasible and if the study process complies with Federal laws and regulations applicable to feasibility studies, and submit it to the authorizing Committees. I respectfully request that your office engage SFWMD as early as possible if any additional information is needed to allow you to forward a final Feasibility Study and Environmental Impact Statement, along with the results of your review and any recommendations, to the authorizing Committees on or before October 1, 2018.

We greatly appreciate the assistance from your office and the U.S. Army Corps of Engineers staff on this very important Everglades restoration project. If you have any questions or would like to discuss, please feel free to contact me at (561) 682-6993 or emarks@sfwmd.gov.

Sincerely,

Ernie Marks
Executive Director

EM/mj

c: Governor Rick Scott
SFWMD Governing Board Members
Florida Congressional Delegation, South Florida's 16 Counties
Senator Joe Negron – Florida Senate
Senator Rob Bradley – Florida Senate
House Speaker Richard Corcoran
FDEP Secretary Noah Valenstein

Enclosures:
1. 15 paper copies of the FS/DEIS, along with Appendices and Annexes
2. 15 CDs containing electronic copies of FS/DEIS, along with Appendices and Annexes
3. Proposed Mailing List of Interest Parties for Public Review